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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR

THIS FILING RELATES TO: *Clevenger v. Meta
Platforms et al.*, 4:22-cv-06457

**STIPULATED PROTOCOL FOR
PLAINTIFF MEDICAL EVALUATION**

The parties, by and through their undersigned counsel, hereby stipulate and agree to the following with regard to the mental examination (“ME”) of Plaintiff Laurel (Bryce) Clevenger (“Clevenger”) pursuant to Federal Rule of Civil Procedure 35.

1. This Protocol governs the nature of the ME to be conducted for Plaintiff Clevenger.
2. The ME shall be conducted by Dr. Octavio Choi, who is a “suitably licensed or certified examiner” under Rule 35(a).
3. The ME shall take place in person at Covington & Burling LLP, Salesforce Tower, 415 Mission Street, Suite 5400, San Francisco, CA 94105 on July 10, 2025 at 9:00 AM PT.
4. The ME shall not last longer than three hours, not inclusive of any breaks.

1 5. The ME will be limited in scope to assessing the extent, nature, and possible cause(s) of
2 any mental or psychiatric disorders or illnesses. Dr. Choi will only conduct psychiatric and psychological
3 evaluations of each Plaintiff and will not conduct any testing.

4 6. Neither party is entitled to videotape any portion of the ME. However, either party may
5 elect to record the examination by audio technology.

6 7. One counsel for Plaintiff may be present during the ME as an observer. An observer may
7 monitor the examination, but shall not participate in or disrupt it. Plaintiff's counsel will not discuss the
8 substance of the ME with Plaintiff during breaks. No family member or friend shall attend or be in the
9 room while the ME is in progress.

10 8. The ME will be transmitted via Zoom with an audio and visual telecast, allowing additional
11 defense experts and plaintiffs' experts and counsel to observe virtually (with cameras off). The Zoom
12 screen and the number of people in attendance will not be visible to the Plaintiff during the ME. Plaintiff's
13 face shall be visible on camera in a wide view, but the camera shall not be directly in front of her. In
14 addition, Defendants will have one attorney in attendance at the premises to handle logistical matters, and
15 will arrange for technical personnel, but they will not be present for the examination itself. Dr. Choi and
16 the Defendants' representative handling logistics will not speak with or attempt to engage any family
17 member or friend who may accompany Plaintiff to the examination.

18 9. No family member or friend shall attend or observe the ME either in person or remotely
19 while the ME is in progress; nor shall any such individual speak with or interact with Plaintiff Clevenger
20 during the entirety of the ME, inclusive of any breaks.

21 10. No person other than those specifically mentioned in this stipulation shall be present in
22 person or remotely during the ME.

23 11. Defendants will provide Plaintiff's counsel with "a copy of the examiner's report, together
24 with like reports of all earlier examinations of the same condition" in accordance with the deadline for
25 Defendants' case-specific expert reports in Case Management Order No. 18. Defendants are entitled to
26 request and receive "like reports of all earlier or later examinations of the same condition" as provided by
27 the Rule. All drafts of such reports are considered privileged and need not be disclosed.

28 By stipulating to this agreement, the parties agree to abide by these protocols unless and

1 until the Court denies this stipulation.

2 **IT IS SO STIPULATED AND AGREED.**

3
4 DATED: July 2, 2025

Respectfully submitted,

5
6 /s/ Joseph G. VanZandt

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: July 2, 2025

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen